

Exhibit E

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 4:20-cv-957

DECLARATION OF DAVID NEWELL

I, David Newell, declare as follows:

1. My name is David Newell. I am the Chief Executive of the News Media Association. I have personal knowledge of the matters discussed in this declaration.

2. The News Media Association is the voice of national, regional and local news media organisations in the UK. The NMA exists to promote the interests of news media publishers to Government, regulatory authorities, industry bodies and other organisations whose work affects the industry.

3. As a general matter, News Media Association members sell most of their online advertising inventory through Google's ad platform; members' employees therefore are knowledgeable about the issues presented in this lawsuit.

4. Plano, Texas is a convenient forum for News Media Association members to travel to if they are called to testify as witnesses because Plano, Texas is about twenty-one miles from the Dallas/Forth Worth International Airport.

5. News Media Association members are under financial pressure and have an interest in the prompt resolution of the pending litigation. This forum advances the interests of News Media Association members because of its much lower average time to disposition and trial than the Northern District of California.

I declare that the foregoing is true and correct to the best of my knowledge.

Executed in London, UK, this 2nd day of February 2021.

David Newell

A handwritten signature in dark ink, appearing to read "David Newell". The signature is written in a cursive style with a large initial "D" and a long horizontal stroke at the end.